

SUSMAN GODFREY L.L.P.  
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Suyash Agrawal  
Stephen D. Susman  
Drew D. Hansen (admitted *pro hac vice*)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., *et* : 08-13555 (JMP)  
*al.*, : (Jointly Administered)  
Debtors. :  
: :  
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**VERIFIED STATEMENT OF SUSMAN GODFREY L.L.P. PURSUANT  
TO BANKRUPTCY RULE 2019**

Susman Godfrey LLP (“**Susman Godfrey**”) hereby makes the following verified statement (“**Statement**”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure in connection with the above-captioned Chapter 11 cases (the “**Cases**”) of Lehman Brothers Holdings Inc. and its debtor affiliates (together, the “**Debtors**”) and respectfully states as follows:

1. As of the date hereof, Susman Godfrey represents in the Cases the creditors listed on Exhibit A hereto (together, the “**Represented Parties**”). Susman Godfrey will supplement this statement as necessary.
2. Each of the Represented Parties may hold, whether directly or indirectly, claims against and/or interests in certain of the Debtors arising out of agreements with certain of the

Debtors, in law or equity. The specific nature and amount of these claims and/or interests have not yet been finally determined and may be set forth in proofs of claim or interest filed or to be filed in the Cases.

3. Each of the Represented Parties separately requested that Susman Godfrey represent them in connection with the Cases.

4. The undersigned hereby certifies that this Statement is true and accurate, to the best of the undersigned's knowledge and belief. Susman Godfrey reserves the right to amend this Statement as necessary and will promptly supplement this Statement to the extent any material changes occur in the facts set forth herein or if it is retained by additional parties to represent them in the Debtors' chapter 11 cases.

New York, New York

DATED: August 25, 2011

SUSMAN GODFREY L.L.P.

By: /s/ Suyash Agrawal  
Suyash Agrawal  
Stephen D. Susman  
Drew D. Hansen (admitted *pro hac vice*)

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**EXHIBIT A**

1. Mr. Anthony Victor Lomas  
Mr. Steven Anthony Pearson  
Mr. Michael John Andrew Jervis  
Mr. Dan Yoram Schwarzmann  
Mr. Derek Anthony Howell  
Lehman Brothers International (Europe)  
25 Canada Square  
London E14 5LQ

*As the Joint Administrators and Liquidators of Lehman Brothers International (Europe), and Administration and Liquidation Companies<sup>1</sup>*

2. Mason Capital Management LLC  
110 East 59th Street  
30th Floor  
New York, NY 10022

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<sup>1</sup> The other Administration and Liquidation Companies are Lehman Brothers Limited; Lehman Brothers Holdings PLC; LB UK RE Holdings Limited; Storm Funding Limited; Mable Commercial Funding Limited; Lehman Brothers Europe Limited; Lehman Brothers UK Holdings Ltd; LB UK Financing Ltd; LB SF No. 1; Cherry Tree Mortgages Limited; Lehman Brothers Lease and Financing (No 1) Limited; Zestdew Limited; Monaco NPL (No. 1) Limited; Lehman Commercial Mortgage Conduit Limited; LB RE Financing No. 3 Limited; Lehman Brothers (PTG) Limited; Eldon Street Holdings Limited; LB Holdings Intermediate 2 Limited; and Thayer Properties Limited.